

A REPRESENTATION CONCERNED ABOUT IMPACT OF FLOODING ON WESTBRIDGE PARK

Firstly I agree with the Heritage Assessment of the planning application for an M and S store that “the proposed site lies on low-lying, flood prone land”. The Flood Assessment report 2016 in support of the application recognises that the site is located within flood zone 2 and partly zone 3. Details of the significance of these zones have been clearly mapped and explained. I consider planning permission granted may create future problems. Take the case of the Kilmarnock Asda Store. The Scottish Environment Protection Agency produced a flood map for the area in the vicinity of this superstore (postcode KA1 3XF). Part of the site was deemed to be medium and high flood risk (akin to the M & S proposal). The proposal was passed and built. Unfortunately Firefighters had to rescue 42 people who were stranded by floodwater at a supermarket in East Ayrshire. The Asda at Queen's Drive Retail Park, Kilmarnock, when the store was surrounded by water after the River Irvine burst its banks. Source <http://www.bbc.co.uk/news/uk-scotland-glasgow-west-30573411>

The proposed foodstore could suffer a similar fate . I display personal photographs of flooding in the area. The Environment Agency in a letter to the Flood Risk Assessment for the M and S application state that “Following examination of our records we have no record of flooding in the area”. I suggest these photographs refute that statement.



The construction of the foodstore would increase run off as reported in planning application Drainage Report (2044192 document). The existing run off for a 100 year 6 hour storm would increase from 275m³ to 313³ which is a 13.8% increase. It is also suggested that run off could increase by 20% due to climate change*. Where would this excess water go? “Drainage exceedance” would be directed towards the road (the lowest area) 2.31 paragraph. This in my opinion could create a Kilmarnock type event.

*Climate change: SFRA 2008 5.2 already recognises that peak rainfall intensity will increase by 5% from 1995-2025 and that peak river flow will increase by 10% 1990-2025 to 20% 2025-2055. An increase in peak river flow will inevitably increase flood risk. The nearest upstream gauging station for Stone is at Darlaston (1 km north) and has a bankfull level of 1.49metres. The river reached 2.80 metres on 6 September 2009. Increased runoff has implications for both fluvial and pluvial flood events.

Note: The catchment area for Stone is 230km² (SFRA 2008) which would indicate that a storm event of 30 mms would generate a potential 6,900cubic metres to flow through Stone. This approximates to the volume of 2.76 Olympic size swimming pools on top of the existing river flow. The Met Office News Blog recorded 31.6mms of rainfall in nearby Leek, Staffordshire from Saturday 24th November 2012 until 8 am Sunday 25th November. (Seathwaite in Cumbria received 314mm of rainfall in 24 hours November 19th 2009) The frequency of extreme rainfall in the UK may be increasing, according to analysis by the Met Office. 3 January 2013 “There's evidence to say we are getting slightly more rain in total, but more importantly it may be falling in more intense bursts” Professor Julia Slingo (Met Office)<http://www.bbc.co.uk/news/uk-20896049>

Normally infiltration would create a time lag .However short downpours tend to reduce infiltration capacity and the threat of pluvial flooding increases.

In fact a Stafford Borough Document “Delivering the Plan for Stafford Borough- issues and options Feb 2008 (accessed via consultation portal)” clearly states that “we think that floodplain areas in Stone should not be used for new housing and employment development.” 9.182 This is in line with the National Policy Document Statement 25. Severn Trent Water also does not support “new development on low-lying land adjacent to the river Trent due to water resource implications and we (Stafford Borough Council) agree with this approach”

The Flood Risk Assessment Report in the M and S application is well aware of the perils of this site. 3.6 encourages occupants to

sign up to the Environment Agency Flood Warning Scheme. 3.7 suggests that a Flood Management and Evacuation Plan could “include evacuating the site if open/occupied.” Also specific measures to be taken if flooding is expected, such as raising valuable stock off the floor or removing stock piles of chemicals.” Statement 3.8 “The Scotch Brook is culverted through much of the town and so the risk posed along its route is limited” does not match experiences of August 1987 and other occasions when the Scotch Brook has created serious flooding.

The Environment Agency has replied to Stafford Borough Council on 23rd June 2016 stating
“In the absence of an acceptable Flood Risk Assessment (FRA) we **OBJECT** to the grant of planning permission and recommend refusal “

I appreciate that this information is not succinct but given a short time allocation I would be able to summarise my views which I consider would be beneficial to any hearing.

Robert Jones